



PO Box 2012  
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June 6, 2006

Marlene H. Dortch Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> St, SW  
Washington, DC 20554

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| Re: Comprehensive Review of Universal Service<br>Fund Management, Administration and Oversight | WC Docket No. 05-195 |
| Federal-State Joint Board on Universal<br>Service  | CC Docket No. 96-45  |
| Schools and Libraries Universal Service<br>Support Mechanism                                   | CC Docket No. 02-6   |
| Rural Health Care Support Mechanism  | WC Docket No. 02-60  |
| Lifeline and Link-Up   | WC Docket No. 03-109 |
| Changes to the Board of Directors for the<br>National Exchange Carrier Association, Inc.       | CC Docket No. 97-21  |

Dear Secretary Dortch,

Pursuant to Section 1.1206(b)(1) of the Commission's Rules (Telecomp SolutionsLLC (TeleComp Solutions) hereby submits these *Ex Parte* Comments in regards to the application process for the Schools and Libraries Universal Service Support Mechanism, and more specifically, the Form 486 procedures.

As a consultant, I assist many schools in the state of Michigan with their E-Rate applications. I would like to bring to your attention the manner in which the service start date for discounted services is determined for late-filed Form 486's. This text is taken directly from USAC's website:

*You may file a Form 486 no earlier than the receipt of a Funding Commitment Decision Letter (FCDL) from the SLD.*

*In general, the Form 486 MUST be postmarked no later than 120 days after the Service Start Date featured on the Form 486 or no later than 120 days after the date of your FCDL, whichever is later, in order to receive discounts retroactively to the Service Start Date.*

*If the Form 486 is postmarked later than the above deadline, the date 120 days before the Form 486 postmark date will become the start date for discounted services on those Funding Requests featured on the Form 486. SLD will not provide discounts for the services rendered prior to the new start date and will reduce the funding commitment for the relevant FRN as appropriate<sup>1</sup>*

This procedure unfairly discriminates against schools and/or libraries that receive later Funding Commitment Decision Letters (FCDLs). To best illustrate my point, I will give you an hypothetical example of two school districts, ***each of which filed their 486's one day late***. School District A received their FCDL on 8/15/05 and School District B received their FCDL on 11/15/05. If they both file their 486's one day after the deadline (District A would have filed on 12/14/05 and District B would have filed on 3/16/06), their service start dates would be 8/16/05 and 11/16/05 respectively. Both districts filed one day later than allowed, yet School District B is penalized for three extra months, merely because they received their FCDL later than School District A.

I believe that a more equitable application of the rule would be to set the revised service start date to be the original service start date featured on the Form 486 plus the number of days that the Form 486 was filed after the due date.

I appreciate your consideration of my concerns.

Respectfully Submitted,

Lori Leugers  
Consultant  
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<sup>1</sup> From USAC's website:

<http://www.universalservice.org/sl/applicants/step10/form486-deadlines.aspx>